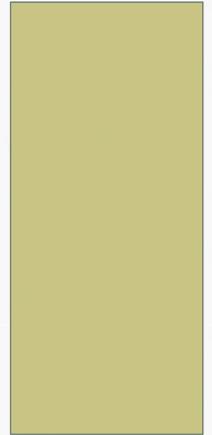




# COMPLIANCE PROGRAM

OFFICE OF THE COMMISSIONER  
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# WHAT IS COMPLIANCE?

confidentiality  
audits  
screening  
standards  
**Compliance**  
investigation laws  
sanctions  
reports  
HIPAA  
government

# COMPLIANCE IS A CULTURE

*It is internal programs and policy decisions made by a company in order to meet the standards set by government laws and regulations. It is about prevention, detection, collaboration and enforcement.*

# BENEFITS OF A COMPLIANCE PROGRAM

- Demonstrates a strong commitment to honest, responsible corporate citizenship
- Quality of care is enhanced
- Maintain Code of Conflict
- May mitigate sanctions
- Provides ongoing training and education
- Strengthens a relationship of trust

# OFFICE OF INSPECTOR GENERAL

## Model for Compliance Plans

- Voluntary Program
- Deficit Reduction Act (DRA)
- Stop Fraud/Recover Monies
- Federal Sentencing Guidelines
- False Claim Act
- Stark Laws
- Anti-kickback Statutes

# ELEMENTS OF A COMPLIANCE PROGRAM

1. Standards, Policies and Procedures
2. Compliance Program Administration
3. Screening, Evaluation of Employees, Physicians, Vendors and other Agents
4. Communication, Education and Training
5. Monitoring, Auditing and Internal Reporting Systems
6. Enforcement and Discipline
7. Investigations, Response and Prevention

# 1. STANDARDS, POLICIES & PROCEDURES

Create an organization infrastructure to develop and implement the program

Integrate mission, vision, values and ethical principles with Code of Conduct; enterprise-wide

- Appointment of Compliance Officer
- Compliance Committee
- Regular Sanction checks for work force, vendors, others
- Employees attestation (in writing) of receipt and understanding
- Develop and refine policies and procedures

## 2. COMPLIANCE PROGRAM ADMINISTRATION

- Commitment from top Leadership
  - Active involvement of compliance committee
  - Develop internal controls/systems to mitigate risk
  - Promote a culture of trust and accountability
    - Engagement of workforce

### 3. SCREENING AND EVALUATION OF WORKFORCE, VENDORS AND OTHER AGENTS

- Monitor government sanction lists for exclusions
  - Conduct education on Conflict of Interest accountability and disclosure
  - Establish policy that outlines compliance obligations of all workforce, vendors and other 3<sup>rd</sup> parties.

## 4. COMMUNICATION, EDUCATION & TRAINING

- Communicate compliance information throughout the organization
- Education and training for all new and current workforce
- Promote a culture of compliance throughout
- Vendors , contractors held to the same standards as workforce
- Encourage workforce to seek guidance/clarification when in doubt
- Sanction policy for compliance violations

## 5. MONITORING, AUDITING & INTERNAL REPORTING

- Open door policy
- Availability of Hotline for anonymous reporting
- Ongoing review and monitor of revenue cycle
- Compliance Audits
- Establishment of reporting and Investigation process
- Timely response to reported compliance concerns

## 6. ENFORCEMENT AND DISCIPLINE

- Fair, equitable and consistent disciplinary process
- Workforce has an obligation to report suspected noncompliance
- Discipline will be administered for non-compliant activity

## 7. RESPONSE & PREVENTION

- Monitor and communicate policy changes
- Promote culture of compliance and self-disclosure
- Coordinated process of investigation
- Communicate noncompliance through appropriate channels
- Institute immediate measures as necessary to mitigate harm